

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re: Vicki Lynn Hayford, Debtor

)  
)

Case No. 16-31292-KRH  
Chapter 13

**NOTICE OF HEARING AND OBJECTION TO CONFIRMATION**

COMES NOW the Chapter 13 Trustee, Suzanne E. Wade, and moves this Court to deny confirmation of the plan dated March 16, 2016, for the cause as follows:

1. The Debtor filed this Chapter 13 Petition, now pending in the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division, on March 16, 2016 under 11 U.S.C. Chapter 13.
2. This Objection is filed pursuant to 11 U.S.C. § 1325.
3. The Trustee would request the Debtor provide a current market analysis for the Debtor's real property located at 8013 Sycamore Lane, Henrico, VA 23228.

WHEREFORE, for the reasons stated herein, the Chapter 13 Trustee respectfully moves the Court to deny confirmation of the Debtor's proposed Chapter 13 Plan, and for such further and other relief as the Court deems necessary.

**Notice is hereby given, pursuant to Local Rule 3015(E)(2), that a hearing on this motion will be held at United States Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, Virginia, 23219, on June 8, 2016 at 11:10 A.M.**

Date: May 19, 2016

/s/ Suzanne E. Wade  
Chapter 13 Trustee

**Suzanne E. Wade, Chapter 13 Trustee**  
Virginia State Bar Number 31868  
1313 East Main Street, Suite A  
Post Office Box 1780  
Richmond, Virginia 23218-1780  
(804) 775-0979

**CERTIFICATE OF SERVICE**

I hereby certify a true copy of the foregoing NOTICE OF HEARING AND OBJECTION TO CONFIRMATION was served by first-class mail, postage prepaid, this 19th day of May, 2016, upon the Debtor, Vicki Lynn Hayford, at 8013 Sycamore Lane, Henrico, VA 23228. Debtor's counsel, Richard James Oulton, Esquire, was served by electronic notification to [2debtlawgroup@gmail.com](mailto:2debtlawgroup@gmail.com).

/s/ Suzanne E. Wade  
Chapter 13 Trustee

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re: Vicki Lynn Hayford, Debtor	)	Case No. 16-31292-KRH
	)	Chapter 13
8013 Sycamore Lane	)	
Henrico, VA 23228	)	
	)	
XXX-XX-0377	)	

**NOTICE OF OBJECTION TO CONFIRMATION**

Suzanne E. Wade, Chapter 13 Trustee, has filed papers with the Court objecting to the confirmation of your Chapter 13 Plan dated March 16, 2016.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the Court to grant the relief sought in the Objection, or if you want the Court to consider your views on the Objection, then on or before three (3) days before the date of the hearing, you or your attorney must:

File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough that the Court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, Virginia 23219

You must also mail a copy to:

Suzanne E. Wade, Chapter 13 Trustee  
Post Office Box 1780  
Richmond, Virginia 23218-1780

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Objection, and may enter an order granting that relief.

Date: May 19, 2016

/s/ Suzanne E. Wade  
Chapter 13 Trustee

**Suzanne E. Wade, Chapter 13 Trustee**  
Virginia State Bar Number 31868  
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/s/ Suzanne E. Wade  
Chapter 13 Trustee